

07 June 2019

Mr Gerard McMullen  
Pulse Australia Standards Committee  
Via email: gerardmcmullen@optusnet.com.au

Cc: Nick Goddard, CEO Pulse Australia: admin@pulseaus.com.au; nick@pulseaus.com.au

**RE: Committee queries in response to GrainGrowers Submission: Pulse Standard Review. Defective tolerance – CSP – 5.2.1 Faba Beans – NO.1 GRADE MINIMUM RECEIVAL STANDARD FARMER DRESSED (herein referred to “No.1 Domestic”)**

Dear Gerard,

During the teleconference held Tuesday 23 April, members requested some additional information regarding GrainGrowers' Submission to the Pulse Standards Review, re: Defective tolerance - CSP – 5.2.1 FABA BEANS – NO.1 GRADE MINIMUM RECEIVAL STANDARD FARMER DRESSED, dated 10 May 2018 (attached).

GrainGrowers welcomes the opportunity to provide further clarification on this matter and thank the committee for bringing other inconsistencies in Australian Pulse Standards to our attention.

**Question 1) Why has GrainGrowers singled out Faba Beans and the need to review defective tolerances in NO.1 GRADE MINIMUM RECEIVAL STANDARD FARMER DRESSED?**

The proposal for changes to the defective tolerance for Faba Beans was suggested in response to grower concerns over the substantial difference between receival and export standards, specifically in response to Faba Beans. GrainGrowers understands and supports the requirement for differences between receival and export standards to account for damage that could impact quality during the storage and handling process. However, we believe there is a need for consistency in the approach to defective (all other defects) across Australian Pulse Standards. This includes No.1 Domestic, No. 2 Domestic and No.1 Export standards.

To achieve this consistency, GrainGrowers proposes the current parameter for Faba No.1 'Defective (all other defects)' 6% Max by weight (includes 3% max by weight poor colour and 3% max by weight total all other defects) be amended to allow for up to 6% (not specified) all other defects; in-line with the approach towards Faba No.1 Export and other subsequent grades.

**Question 2) Should these changes be extended to Green Lentils and Red Lentils?**

During consultation with members regarding defective tolerances in faba beans, no additional commodities were highlighted for our consideration, and as such GrainGrowers had previously not reviewed these other standards comprehensively. However, following the notification by the

Committee regarding the inconsistencies that exist for lentils (green and red), we have reviewed these standards and support their amendment to achieve greater consistency.

Table 1 and 2 summarise the current and our proposed standards for maximum defective tolerances for Lentils – Whole Green and Whole Red in Australia:

**Table 1: Current Standards (2018/19)**

	Whole Green No.1 Domestic	Whole Red No.1 Domestic	Whole Red No.2 Domestic	Whole Green No.1 Export (bulk)	Whole Red No.1 Export (bulk)	Whole Red No.2 Export (bulk)
<b>Defective (Poor seed coat colour)</b>	1%	1%	3%	1%	1%	3%
<b>Defective (Poor kernel colour)</b>	1%	1%	1%	1%	1%	1%
<b>Defective (all other defects)</b>	3%	3%	5%	Not specified (thus up to 10%)	Not specified (thus up to 10%)	Not specified (thus up to 14%)
<b>Defective (total, includes colour)</b>	4%	4%	8%	10%	10%	14%

**Table 2: Proposed Standards (2019/20)**

	Whole Green No.1 Domestic	Whole Red No.1 Domestic	Whole Red No.2 Domestic	Whole Green No.1 Export (bulk)	Whole Red No.1 Export (bulk)	Whole Red No.2 Export (bulk)
<b>Defective (Poor seed coat colour)</b>	1%	1%	3%	1%	1%	3%
<b>Defective (Poor kernel colour)</b>	1%	1%	1%	1%	1%	1%
<b>Defective (all other defects)</b>	Not specified (thus up to 4%)	Not specified (thus up to 4%)	Not specified (thus up to 8%)	Not specified (thus up to 10%)	Not specified (thus up to 10%)	Not specified (thus up to 14%)
<b>Defective (total, includes colour)</b>	4%	4%	8%	10%	10%	14%

GrainGrowers recommends that these proposed changes be included in the Standards Review for broader consultation with industry given the differences in value, quality standards and measurement, and end-uses that exist between the two commodities (lentils and faba beans); and to determine any potential implications for stakeholders across the supply chain resulting from any changes to defective tolerances.

Please let me know if GrainGrowers can provide any additional information. I can be contacted on (02) 9286 2000.

Yours sincerely,

Lucy Darragh  
Policy Officer, Grain Growers Limited